

No. 20-55770

---

**IN THE UNITED STATES COURT OF APPEALS  
FOR THE NINTH CIRCUIT**

---

TIMOTHY ROBBINS, et al.,  
Respondents-Appellants,

v.

ALEJANDRO RODRIGUEZ, et al.,  
Petitioners-Appellees.

---

On Appeal from the United States District Court, Central District of California  
No. CV 07-3239-TJH (RNB)

---

**JOINT MOTION FOR NUNC PRO TUNC 60 DAY EXTENSION TO FILE  
PETITION FOR PANEL REHEARING OR REHEARING EN BANC**

---

EVA BITRAN  
[ebitran@aclusocal.org](mailto:ebitran@aclusocal.org)  
ACLU Foundation  
of Southern California  
1313 West Eighth Street  
Los Angeles, CA 90017  
Telephone: (213) 977-5232

JUDY RABINOVITZ  
[jrabinovitz@aclu.org](mailto:jrabinovitz@aclu.org)  
ACLU Immigrants' Rights Project  
125 Broad Street, 18<sup>th</sup> Floor  
New York, NY 10004  
Telephone: (212) 549-2618  
Facsimile: (212) 549-26

AHILAN ARULANANTHAM  
[arulanantham@law.ucla.edu](mailto:arulanantham@law.ucla.edu)  
UCLA School of Law  
Center for Immigration  
Law and Policy  
385 Charles Young Drive East  
Los Angeles, CA 90095  
Telephone: 310-825-1029

JAYASHRI SRIKANTIAH  
[jsrikantiah@law.stanford.edu](mailto:jsrikantiah@law.stanford.edu)  
Stanford Law School  
Immigrants' Rights Clinic  
Crown Quadrangle  
559 Nathan Abbott Way  
Stanford, CA 94305-8610  
Telephone: (650) 724-2442  
Facsimile: (650) 723-4426

SEAN COMMONS (SBN 217603)  
[scommons@sidley.com](mailto:scommons@sidley.com)  
ALEXANDRIA RUIZ (SBN 313286)  
[aruiz@sidley.com](mailto:aruiz@sidley.com)  
SIDLEY AUSTIN LLP  
350 South Grand Avenue  
Los Angeles, CA 90071  
Telephone: (213) 896-6000  
Facsimile: (213) 896-6600

The parties respectfully request that this Court extend the deadline to file the Petition for Panel Rehearing or Rehearing En Banc (PFR/EB) by 60 days to afford the parties time to explore settlement negotiations. The Court granted the parties' eleven prior requests for an extension of the PFR/EB deadline. Because the Court set the prior deadline for March 24, 2025, the parties respectfully request that the new deadline be set *nunc pro tunc* from that date.

The Memorandum in this Case was issued on October 19, 2021 (ECF 30). At the parties' request, this Court has granted eleven extensions of the deadline to file a PFR/EB (ECF 32, 35, 37, 39, 41, 43, 45, 51, 53, 55, 63, 65). The current due date for the PFR/EB is March 24, 2025. The parties respectfully request that the due date be extended by 60 days to May 23, 2025.

Good cause exists for this request. As previously disclosed to this Court, the parties agreed to mediate this matter under the supervision of a federal magistrate judge. The parties have attended multiple mediation sessions with the magistrate. During this time period, the parties have also met and conferred by phone and written correspondence, including by exchanging written settlement proposals.

Given the important interests at stake and the complexity of the issues for consideration, the parties require additional time to determine whether a settlement can be reached. A potential settlement may resolve all, or parts, of Petitioners' claims, including to the relief at issue in this appeal. As such, the parties agree that judicial economy would be best served by continuing to engage in settlement

negotiations.

For the foregoing reasons, the parties respectfully request that the deadline to file the Petition for Panel Rehearing or Rehearing En Banc be extended by 60 days. The parties will notify the Court if any additional extensions are warranted because settlement discussions are ongoing.

Respectfully submitted,

Dated: March 26, 2025

*s/ Sean A. Commons*

SEAN A. COMMONS

Counsel for Petitioners-Appellees

Dated: March 26, 2025

*s/ Sarah Wilson*

SARAH WILSON

Counsel for Respondents-Appellants